

IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE  
MEMPHIS DIVISION

IN RE: SYLVIA JEAN GLOSTER, Debtor

NO.

15-30975 K/S  
Chapter 13

**RESPONSE TO DEBTOR'S MOTION TO SELL REAL PROPERTY**

Comes now ANSON STREET LLC, a secured creditor, (hereinafter "Respondent"), by and through its attorney, Joshua I. Goldman, Mickel Law Firm, P.A., and for its Response to Debtor's Motion to Sell Real Property, states:

1. Respondent is the servicer of the Note and Mortgage on the real property located at 4335 Hunters Glen Street, Memphis, TN 38128 (Proof of Claim 3-1).
2. Respondent has no objection to the sale of the property as long as any order granting the motion provides that the mortgage is paid in full from the proceeds of the sale.
3. Upon request, Respondent will provide a copy of its payoff on the mortgage loan in order to have accurate closing proceeds remitted to Respondent.

WHEREFORE, Respondent prays for an Order of this Court requiring that the debt to ANSON STREET LLC be either paid in full from the proceeds of the sale, or a short sale agreement be reached between the parties, and for any and all other proper relief.

Respectfully submitted,

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By: /s/ "Joshua I. Goldman"  
JOSHUA I. GOLDMAN  
Tennessee. Bar No. 035733  
Attorney for Respondent

**CERTIFICATE OF SERVICE**

I, Joshua I. Goldman, hereby certify that a true and correct copy of the foregoing Response has been served upon the following parties in interest either via pre-paid regular U.S. Mail, or via electronic notification on the same day it was filed with the court:

**Debtor's Attorney**

Jimmy E. McElroy  
Attorney at Law  
3780 S. Mendenhall  
Memphis, TN 38115

**Office of the Chapter 13 Trustee**

George W. Stevenson  
5350 Poplar Avenue, Suite 500  
Memphis, TN 38119

/s/ "Joshua I. Goldman"  
JOSHUA I. GOLDMAN  
Attorney for Respondent